

## REMARKS

Reconsideration of the application as amended is respectfully requested. An RCE accompanies this Amendment.

Claims 47, 49-51, 56-58, 61, 75, and 77-79 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over International Application Publication WO9936948 A1 of Adams et al. ("Adams") in view of U.S. Patent No. 6,428,713 of Christenson et al. ("Christenson").

Claims 47, 49-51, 56-58, 61, 75, and 77-79 stand rejected under U.S.C § 103(a) as being unpatentable over U.S. Patent No. 6,074,890 of Yao et al. ("Yao") in view of Christenson.

Claims 52, 53, 62, 63, 80, and 81 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Adams in view of Christenson and U.S. Patent No. 5,719,073 of Shaw et al. ("Shaw").

Claims 52, 53, 62, 63, 66-68, 70-72, 80, and 81 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Yao in view of Christenson and Shaw.

Claims 55, 65, and 83 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Adams in view of Christenson and in view of U.S. Patent No. 5,591,679 of Jakobsen et al. ("Jakobsen").

Claims 55, 65, and 83 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Yao in view of Christenson and Jakobsen.

Claim 59 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Adams in view of Christenson and U.S. Patent No. 6,030,887 of Desai et al. ("Desai").

Claim 59 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Yao in view of Christenson and Desai.

Claim 69 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Yao in view of Christenson, Shaw, and U.S. Patent No. 6,514,789 to Denton et al. ("Denton"). Applicants note that the correct patent number for Denton is U.S. Patent No. 6,514,789, not U.S. Patent No. 6,515,789, as indicated in the Office Action of May 10, 2006.

Claims 47, 56, 66, and 75 have been amended. It is respectfully submitted that the amendments do not add new matter. Applicants reserve all rights with respect to the applicability of the doctrine of equivalents.

The Examiner has rejected claim 47 under 35 U.S.C. § 103(a) in view of Adams and Christenson. Applicants respectfully submit, however, that amended claim 47 is not obvious under 35 U.S.C. § 103(a) in view of Adams and Christenson.

It is respectfully submitted that Adams does not teach or suggest a combination with Christenson and that Christenson does not teach or suggest a combination with Adams. It would be impermissible hindsight based on applicant's own disclosure to combine Adams and Christenson.

Even if Adams and Christenson were combined, such a combination would lack the following limitations of amended claim 47:

after forming the narrow blades, bonding a base wafer to the second side of the substrate;  
etching through the vias on the first side of the substrate to release the structures and to provide electrical isolation, wherein at least one of the narrow blades is isolated by one of the vertical isolation trenches, and wherein at least one of the narrow blades is coupled to one of the structures.

(Amended claim 47) (emphasis added).

The Examiner has rejected claim 47 under 35 U.S.C. § 103(a) in view of Yao and Christenson. Applicants respectfully submit, however, that amended claim 47 is not obvious under 35 U.S.C. § 103(a) in view of Yao and Christenson.

It is respectfully submitted that Yao does not teach or suggest a combination with Christenson and that Christenson does not teach or suggest a combination with Yao. It would be impermissible hindsight based on applicants' own disclosure to combine Yao and Christenson.

Even if Yao and Christenson were combined, such a combination would lack the following limitations of amended claim 47.

after forming the narrow blades, bonding a base wafer to the second side of the substrate;  
etching through the vias on the first side of the substrate to release the structures and to provide electrical isolation, wherein at least one of the narrow blades is isolated by one of the vertical isolation trenches, and wherein at least one of the narrow blades is coupled to one of the substrates.

(Amended claim 47) (emphasis added).

Given that claims 49-53 and 55 are dependent claims that depend, directly or indirectly, from amended claim 47 and add limitations, applicants respectfully submit that claims 49-53 and 55 are not obvious under 35 U.S.C. § 103(a) in view of the art cited by the Examiner.

The Examiner has rejected 56 under 35 U.S.C. § 103(a) in view of Adams and Christenson. Applicants respectfully submit, however, that amended claim 56 is not obvious under 35 U.S.C. § 103(a) in view of Adams and Christenson.

It is respectfully submitted that Adams does not teach or suggest a combination with Christenson and that Christenson does not teach or suggest a combination with Adams. It would be impermissible hindsight based on applicants' own disclosure to combine Adams and Christenson. It would be impermissible hindsight based on applicants' own disclosure to combine Adams and Christenson.

Even if Adams and Christenson were combined, such a combination would lack the following limitations of amended claim 56:

after forming the narrow blades, fusion bonding a recessed base wafer to the second side of the substrate;

...  
etching through the vias on the first side of the substrate to release the structures, wherein at least one of the narrow blades resides between two of the vertical trenches, and wherein at least one of the narrow blades is coupled to one of the structures.

(Amended claim 56) (emphasis added).

The Examiner has rejected claim 56 under 35 U.S.C. § 103(a) in view of Yao and Christenson. Applicants respectfully submit, however, that amended claim 56 is not obvious under 35 U.S.C. § 103(a) in view of Yao and Christenson.

It is respectfully submitted that Yao does not teach or suggest a combination with Christenson and that Christenson does not teach or suggest a combination with Yao. It would be impermissible hindsight based on applicant's own disclosure to combine Yao and Christensen.

Even if Yao and Christenson were combined, such a combination would lack the following limitations of amended claim 56:

after forming the narrow blades, fusion bonding a recessed base wafer to the second side of the substrate;

...  
etching through the vias on the first side of the substrate to release the structures, wherein at least one of the narrow blades resides between two of the vertical trenches, and wherein at least one of the narrow blades is coupled to one of the structures.

(Amended claim 56) (emphasis added).

Given that claims 57-59 and 61-65 are dependent claims that depend, directly or indirectly, from amended claim 56 and add limitations, applicants respectfully submit that claims 57-59 and 61-65 are not obvious under 35 U.S.C. § 103(a) in view of the art cited by the Examiner.

The Examiner has rejected claim 66 under 35 U.S.C. § 103(a) in view of Yao, Christensen, and Shaw. Applicants respectfully submit, however, that amended claim 66 is not obvious under 35 U.S.C. § 103(a) in view of Yao, Christenson, and Shaw.

It is respectfully submitted that Yao, Christenson, and Shaw do not teach or suggest a combination with one another. It would be impermissible hindsight, based on applicants' own disclosure to combine Yao, Christenson, and Shaw.

Even if Yao, Christenson, and Shaw were combined, such a combination would lack the following limitations of amended claim 66:

after forming the narrow blades, bonding a base wafer to the second side of the SOI substrate;

etching through the vias on the first side of the substrate to release the structures.

(Amended claim 66) (emphasis added).

Given that claims 68-72 are dependent claims that depend from amended claim 66 and add limitations, applicants respectfully submit that claims 68-72 are not obvious under 35 U.S.C. § 103(a) in view of the art cited by the Examiner.

The Examiner has rejected claim 75 under 35 U.S.C. § 103(a) in view of Adams and Christenson. Applicants respectfully submit, however, that amended claim 75 is not obvious under 35 U.S.C. § 103(a) in view of Adams and Christenson.

It is respectfully submitted that Adams does not teach or suggest a combination with Christenson and that Christenson does not teach or suggest – combination with Adams. It would be impermissible hindsight based on applicants' own disclosure to combine Adams and Christenson.

Even if Adams and Christenson were combined, such a combination would lack the following limitations of amended claim 75:

after forming the narrow blades, bonding a base wafer to the spacer substrate;  
etching through the vias on the first side of the substrate to release the structures, wherein at least one of the narrow blades resides between two of the vertical trenches, and wherein at least one of the narrow blades is coupled to one of the structures.

(Amended claim 75) (emphasis added).

The Examiner has rejected claim 75 under 35 U.S.C. § 103(a) in view of Yao and Christenson. Applicants respectfully submit, however, that amended claim 75 is not obvious under 35 U.S.C. § 103(a) in view of Yao and Christenson.

It is respectfully submitted that Yao does not teach or suggest a combination with Christenson and that Christenson does not teach or suggest a combination with Yao. It would be impermissible hindsight based on applicant's own disclosure to combine Yao and Christenson.

Even if Yao and Christenson were combined, such a combination would lack the following limitations of amend claim 75:

after forming the narrow blades, bonding a base wafer to the spacer substrate;  
etching through the vias on the first side of the substrate to release the structures, wherein at least one of the narrow blades reside between two of the vertical trenches, and wherein at least one of the narrow blades is coupled to one of the structures.

(Amended claim 75) (emphasis added).

Applicants therefore respectfully submit that the rejections and objections set forth in the Office Action have been overcome.

Given that claims 77-81 and 83 are dependent claims that depend, directly or indirectly, from amended claim 75 and add limitations, applicants respectfully submit that claims 77-81 and 83 are not obvious under 35 U.S.C. § 103(a) in view of the art cited by the Examiner.


Applicants respectfully submit that all the rejections and objections have been overcome.

If there are any charges not covered by any check submitted, please charge Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: November 13, 2006

  
\_\_\_\_\_  
Lester J. Vincent  
Registration No. 31,460

12400 Wilshire Boulevard  
Seventh Floor  
Los Angeles, CA 90025  
(408) 720-8300